

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Expanding Flexible Use of the 3.7 to 4.2 GHz Band)	GN Docket No. 18-122
)	
Expanding Flexible Use in Mid-Band Spectrum)	GN Docket No. 17-183
Between 3.7 and 4.2 4 GHz)	(Inquiry Terminated as to 3.7-4.2 GHz)
)	
Petition for Rulemaking to Amend and Modernize)	RM-11791
Parts 25 and 101 of the Commission's Rules to)	
Authorize and Facilitate the Deployment of)	
Licensed Point-to-Multipoint Fixed Wireless)	
Broadband Service in the 3.7-4.2 GHz Band)	
)	
Fixed Wireless Communications Coalition, Inc.,)	RM-11778
Request for Modified Coordination Procedures in)	
Band Shared Between the Fixed Service and the)	
Fixed Satellite Service)	

COMMENTS OF OLYMPUSAT, INC

OLYMPUSAT, INC submits these comments in response to the above-captioned Notice of Proposed Rulemaking ("NPRM") in which the Federal Communications Commission solicits feedback on proposals to permit terrestrial mobile use of the 3700-4200 MHz band (the "C-band").¹ We have three primary goals in submitting these comments: (1) make perfectly clear that the C-band content distribution services provided by satellite operators are essential to our business; (2) support the market-based approach of Intelsat License LLC, SES Americom, Inc., and Intel Corporation proposed in the NPRM to allow terrestrial mobile use of the C-band;² and (3) oppose new fixed point-to-multipoint ("P2MP") services in the C-band and associated proposed limits on full-band, full-arc protection for satellite earth stations.

¹ *Expanding Flexible Use of the 3.7-4.2 GHz Band*, Order and Notice of Proposed Rulemaking, GN Docket No. 18-122, FCC 18-91 (rel. July 13, 2018).

² See NPRM ¶¶ 66-97.

Olympusat owns and operates 25 linear television networks and distributes many of these as well as third party network clients via satellite. For services, Olympusat offers and effectively delivers End-to-End solutions for video providers, broadcast networks and cable services in the U.S. and Latin America. Olympusat is a leader in national distribution of transactional networks, reaching over 70 million homes in the U.S. with cost effective opportunities for every operator. We provide turn-key solutions utilizing the latest technology with a variety of network delivery methods that include: Satellite, Fiber and Point to Point via IP. for a vast portfolio of clients that include part-time and 24/7 shopping networks, infomercial networks, and faith-based networks.

Thus, the C-band forms the backbone of the infrastructure content companies use to supply consumers across the country with premium [video] programming. Any change in the current C-band operating environment could negatively affect our business³ and the American consumers we serve. Most of our networks/network clients who utilize satellite have literally hundreds of delivery points. The loss of ability to deliver via C-band satellite would cause a profound ~~affect~~effect on their business, including potentially shuttering our/their networks and eliminating jobs.

C-band offers reliability, quality, and cost efficiency that cannot be matched by other technologies or in other satellite spectrum. While fiber and IP delivery can be an effective point to point delivery method, for point to multi point delivery (especially hundreds of delivery points), it is not cost effective nor as reliable. Ku-band is not considered an alternative given its susceptibility to rain fade and attenuation. If Ku-band were an alternative, networks would be using it now, and for the most part they're not using it for those same ~~reasons~~Switching reasons

³ Indeed, our industry has made substantial investments in C-band facilities to expand and update our distribution networks to ensure that all Americans have access to high quality content.

switching away from C-band satellites would also strand the investment Olympusat has made in the ground stations used for content distribution.

Moreover, the record suggests that co-frequency sharing between terrestrial mobile services and satellite operations is not feasible. As the NPRM recognizes, because signals from satellites are very weak when they reach the ground, terrestrial mobile operations could cause harmful interference to earth stations over large distances.⁴ Any risk of interference to the C-band satellite services on which Olympusat relies is unacceptable, not only from a business revenue perspective, but because it jeopardizes the ability of American consumers to receive the programming content they want and upon which they rely. Olympusat prides itself on offering a unique value proposition for our Hispanic customers, most of whom are in the United States. We believe this community is underserved and that elimination of this delivery method could further erode quality of content options for Hispanic customers.

The proper management of the future of the C-band is critical to the continued vitality of our business. Thus, we believe that a market-based approach, led by satellite operators, is the only practical solution for introducing terrestrial mobile operations in the C-band. Cable, systems, broadcasters and content delivery companies have been working with satellite operators for decades. We are their customers, and they understand our needs and have direct knowledge of our operations. Consequently, satellite operators are best positioned to protect our company and other incumbent users while also undertaking the arduous and costly task of clearing spectrum for terrestrial mobile use. We urge the Commission to move forward with the market-based solution discussed in the NPRM.⁵

⁴ See NPRM ¶ 50.

⁵ See NPRM ¶¶ 66-97.

Finally, the Commission should not allow new P2MP services in the C-band or restrict the protection of C-band earth stations across the full spectrum band and the visible satellite arc.⁶ The flexibility to change frequencies and receive antenna orientations is essential to the value of the C-band satellite capacity on which Olympusat and others rely. This flexibility allows restoration of service if an outage affects our primary space segment and facilitates the resolution of interference issues, as well as enabling us to take advantage of competition among satellite operators. The requirement to work around new P2MP facilities would undermine the nationwide reach of C-band service, and the requirement to modify earth station licenses for any change in operating parameters would impose significant and unjustified regulatory burdens. Olympusat urges the Commission to focus on other spectrum that is not as intensely used as the C-band to meet any requirements for additional frequencies suitable for P2MP operations.

Respectfully submitted,

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⁶ See NPRM ¶¶ 37-40 & 116-132.